

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Ines V. Colon		Chapter 13 Proceeding
	Debtor(s)	20-13374 AMC
WELLS FARGO BANK, N.A.		
	Movant	
v. Ines V. Colon and William C. Miller		
	Respondents	

OBJECTION TO CONFIRMATION OF PLAN

WELLS FARGO BANK, N.A. (Movant), a secured creditor in this case objects to the confirmation of the Debtor's Chapter 13 Plan and states the following:

1. The plan does not provide for the secured creditor, WELLS FARGO BANK, N.A., to receive the full value of its claim in violation of 11 U.S.C. §1325(a)(5)(B)(ii).
2. As of the date of the filing on August 17, 2020, Movant is the holder of a secured claim in the estimated amount of \$17,096.89 secured by the Debtor's property located at 94 Hollybrooke Drive, Middletown, PA 19056. A Proof of Claim will be filed on or before the claims deadline.
4. Debtor's Plan proposes to pay Movants pre petition arrears in the amount of \$14,235.31 rather than the correct amount of \$17,096.89. Debtors plan also fails to provide provisions for the future payments of taxes and insurance. A copy of the Plan is attached hereto as Exhibit "B".

5. If the plan is confirmed, the Movant may suffer irreparable injury, loss and damage.

WHEREFORE, WELLS FARGO BANK, N.A. respectfully requests that confirmation of the plan be denied.

Respectfully Submitted,

/s/ Sarah K. McCaffery, Esquire

POWERS KIRN, LLC

Jill Manuel-Coughlin, Esquire; ID #63252

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Attorney for Movant

Dated: September 29, 2020